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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

MARK FITZ, GRAYGUNS, INC.;
G4 ARCHERY, LLC; SECOND
AMENDMENT FOUNDATION; and
FIREARMS POLICY COALITION,
INC.,

Plaintiffs,

v.

ELLEN ROSENBLUM, in her official
capacity as Attorney General of the
State of Oregon; and TERRI DAVIE,
in her official capacity as
Superintendent of the Oregon State
Police,

Defendants.

Case No.

**DECLARATION OF JESSICA
HARRIS IN SUPPORT OF
PLAINTIFFS' EMERGENCY
MOTIONS FOR A TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

I, Jessica Harris, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746,
that the following statements are true and correct to the best of my knowledge:

1. I am over 18 years of age, competent to testify, and have personal
knowledge of the matters stated herein. I make this Declaration in support of plaintiffs'
emergency motions for a temporary restraining order and preliminary injunction.

2. I am an owner of G4 Archery, LLC (“G4 Archery”), a federally licensed firearm dealer located in Washington County, Oregon.

3. I am a member of the Second Amendment Foundation and Firearms Policy Coalition.

4. G4 Archery sells “standard capacity magazines,” defined for the purpose of this declaration as magazines which hold more than 10 rounds of ammunition, both as standard equipment for many of the firearms it sells and also as standalone products.

5. When Oregon’s standard capacity magazine ban goes into effect, G4 Archery will be forced to stop selling standard capacity magazines to civilians and to limit its sales to those specifically exempted from the state-wide ban.

6. G4 Archery does not have any preexisting contracts with United States Military or any Law Enforcement entities for which such exceptions could apply. Therefore, Oregon’s Magazine Capacity Ban will entirely foreclose G4 Archery’s ability to lawfully sell standard capacity magazines.

7. The complete categorical prohibition on the sale of standard capacity magazines, to the civilian public not only in Oregon, but throughout the entire United States will have a dramatic deleterious effect on G4 Archery’s overall business and inflict substantial ongoing economic injury.

8. G4 Archery would continue to sell standard capacity magazines but due to Oregon’s standard capacity magazine ban and the accompanying criminal sanctions and loss of liberty I fear prosecution if I were to do so.

DATED this 30th day of November, 2022.

DocuSigned by:

Jessica Harris

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Jessica Harris
Owner
G4 Archery, LLC